

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

THE UNITED STATES OF AMERICA,

v.

MAURICE TURNER,

a.k.a., Jermaine Turner,

Defendant.

Case:2:18-cr-20662

Judge: Cox, Sean F.

MJ: Whalen, R. Steven

Filed: 10-02-2018 At 01:42 PM

INDI USA V MAURICE TURNER (LG)

VIOLATIONS:

18 U.S.C. § 922(g)(1)

18 U.S.C. § 922(o)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 856 (a)(1)

18 U.S.C. § 924(c)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 922(g)(1) -- Felon in Possession of a Firearm)

On or about September 12, 2018, in the Eastern District of Michigan,
Southern Division, the defendant, MAURICE TURNER, being a person convicted
of a felony offense, did knowingly and unlawfully possess firearms, to wit:

- one loaded BSA Glock 27, fully automatic .40 caliber handgun,
- one loaded FN PS90 rifle,
- one loaded AMT, semi-automatic .45 caliber pistol,

which were manufactured outside the State of Michigan, thereby traveling in interstate and foreign commerce to reach this jurisdiction, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

(18 U.S.C. § 922(o) – Illegal Possession of a Machine Gun)

On or about September 12, 2018, in the Eastern District of Michigan, Southern Division, the defendant, MAURICE TURNER, did knowingly and unlawfully possess a machine gun, that is, a loaded BSA Glock 27, fully automatic .40 caliber handgun, in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT THREE

(21 U.S.C. § 841(a)(1) – Possession With Intent to Distribute Controlled Substances)

On or about September 12, 2018, in the Eastern District of Michigan, Southern Division, the defendant, MAURICE TURNER, did knowingly and unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

*(21 U.S.C. § 841(a)(1) – Possession With Intent to Distribute
Controlled Substances)*

On or about September 12, 2018, in the Eastern District of Michigan, Southern Division, the defendant, MAURICE TURNER, did knowingly and unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

(21 U.S.C. § 856(a)(1) – Using and Maintaining a Drug Premises)

On or about September 12, 2018, in the Eastern District of Michigan, Southern Division, the defendant, MAURICE TURNER, did knowingly and unlawfully use and maintain a place, to wit: a residence known as 12048 Engleside, Detroit, Michigan, for the purpose of manufacturing and distributing controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT SIX

(18 U.S.C. § 924(c) – Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about September 12, 2018, in the Eastern District of Michigan, Southern Division, the defendant, MAURICE TURNER, did knowingly and unlawfully possess at least one firearm, as alleged in Count One of this Indictment. This firearm was possessed in furtherance of a drug trafficking crime for which MAURICE TURNER may be prosecuted in a court of the United States, that is, the crime of possession with intent to distribute controlled substances and maintaining a drug involved premises, as alleged in Counts Three, Four and Five of this Indictment, which constitutes a violation of Title 18, United States Code, Sections 924(c)(1)(A) and (B)(ii).

FORFEITURE ALLEGATIONS

18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c)
Criminal Forfeiture

The allegations contained in Counts One through Six of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 21 United States Code, Section 853, and Title 28 United States Code, Section 2461(c).

Upon conviction of any of the offenses set forth in Counts One, Two and Six of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28 United States Code, Section 2461(c), any firearm and ammunition involved in or used in the knowing commission of the offense(s).

Upon conviction of any of the controlled substances offenses alleged in Counts Three through Five of this Indictment, defendant shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the named violations.

If any of the property described in the paragraphs above as being forfeitable under Title 21, United States Code, Section 853, as a result of any act or omission of the defendant- -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America, pursuant to Title 21, United States Code, Section

853(p), intends to seek forfeiture of all other property of defendant up to the value of the above described forfeitable property.

THIS IS A TRUE BILL.

/s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

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Dated: October 2, 2018

United States District Court
Eastern District of Michigan

Criminal Case Co

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to co

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>DAB</u>

Case Title: USA v. Maurice Turner (a/k/a Jermaine Turner)

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information — no prior complaint.
☒ Indictment/ ☐ Information — based upon prior complaint [Case number: 18-MJ-30489]
☐ Indictment/ ☐ Information — based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 2, 2018
Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.